

# JacksonLewis

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March 27, 2025

**VIA ECF and USPS**

Hon. Brenda K. Sannes  
Chief U.S. District Judge  
James. T. Foley U.S. Courthouse  
445 Broadway  
Albany, New York 12207-2936

**Re: Mariah Lopez v. The YWCA of North East New York et al**  
**Index No. 1:24-cv-01516-BKS-PJE**

Dear Judge Sannes:

As you are aware, we represent the YWCA of North East New York (“YWCA NENY”), Kim Siciliano, and Tamara Flanders (collectively “YWCA Defendants”) in the above referenced matter. We write this letter to provide the Court with a disturbing update regarding Plaintiff’s recent conduct in this matter. Last evening, Plaintiff emailed Defendants’ Counsel, copying a number of attorneys who have not appeared in this matter, and threatened to add Defendant’s Counsel as named Defendants to the instant matter if the YWCA Defendants do not accept Plaintiff’s most recent settlement demand by 10:00 AM on March 27, 2025. A copy of Plaintiff’s email is attached hereto as **Exhibit A**.

Up to this point, Defendants have engaged in good faith settlement negotiations in an effort to resolve this matter amicably. In fact, there is a settlement conference scheduled before Magistrate Judge Evangelista on April 14, 2025. Plaintiff has now met Defendants good faith efforts to reach a resolution by attempting to strong-arm Defendants to settle by threatening to add Defendants Counsel as named Defendants on a bad faith, baseless and unspecified conspiracy charge. Plaintiff’s actions are akin to extortion as she is threatening Defendants, and their Counsel, in an effort to recover the settlement demand that she wants. This is not only inappropriate and unacceptable, but also likely sanctionable under Rule 11. This behavior should not be permitted.

Defendants request that Plaintiff be denied the ability to amend the complaint to add defense counsel as defendants in this Action. Alternatively, we request an emergency conference to discuss this matter.

  
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CC

Mariah Lopez, Plaintiff  
Yunis Alloush, Defendant  
Ahmed Alloush, Defendant

# **Exhibit A**

**From:** Mariah Lopez <mariah4change@gmail.com>  
**Sent:** Wednesday, March 26, 2025 8:07 PM  
**To:** DiPalma, Joseph (White Plains); King, Sean B. (White Plains); Tamara Rayne; Kim Siciliano; Yunis ALLOUSH  
**Cc:** david blum; Carolyn DoubleYou; Lisa Weiss  
**Subject:** URGENT Take Notice: Joseph DiPalma, Sean King to be named as Defendants in Plaintiff's Re Pleading



Defendants,

Due to Mr DiPalma and King's outrageous, conspiratorial conduct, they will be added as Defendants in this action via a conspiracy charge under within my re pleadings.

**To avoid this, YWCA Defendants may accept my last settlement demand by 10 am tomorrow morning.**

-ML

***Mariah Lopez***

Executive Director  
**STARR**, Founded 1969.